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9 *ex rel. its Department of Corrections and*  
*Perry Russell*

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 RON SCHRECKENGOST, an individual,  
13 and ELIZABETH WALSH, an individual,

14 Plaintiffs,

15 v.

16 THE STATE OF NEVADA, *ex rel.* the  
17 NEVADA DEPARTMENT OF  
CORRECTIONS, and PERRY RUSSELL,  
18 an individual,

19 Defendants.

Case No. 3:19-cv-00659-MMD-CLB

**STIPULATION AND ORDER TO**  
**EXTEND TIME FOR DEFENDANTS**  
**TO FILE REPLY IN SUPPORT OF**  
**MOTION TO DISMISS PLAINTIFFS'**  
**FIRST AMENDED COMPLAINT**

**(FIRST REQUEST)**

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21 Defendants, STATE OF NEVADA *ex rel.* its DEPARTMENT OF CORRECTIONS and  
22 PERRY RUSSELL, and Plaintiffs, RON SCHRECKENGOST and ELIZABETH WALSH,  
23 pursuant to LR IA 6-1, LR IA 6-2, by and through their counsel of record, hereby stipulate and  
24 agree to a 7-day extension of time, up to and including March 20, 2020, for Defendants to file  
25 their reply brief in support of their Motion to Dismiss Plaintiffs' First Amended Complaint.

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1           This is the first request for an extension of time for Defendants to file a reply in support  
2 of their Motion to Dismiss Plaintiffs' First Amended Complaint. Defendants' reply is currently  
3 due on March 13, 2020.

4           Defendants previously requested and the Court granted a 30-day extension of time to file  
5 their answer or otherwise respond to Plaintiffs' Amended Complaint. ECF No. 6.

6           Plaintiffs requested and the Court granted a 14-day extension of time, and an additional  
7 3-day extension of time to respond to Defendants' Motion to Dismiss. ECF No. 12; ECF No.  
8 18.

9           This request is based on good cause and not for purpose of delay. Defendants are  
10 requesting additional time to file a reply brief in support of Defendants' Motion to Dismiss  
11 Plaintiffs' Amended Complaint to accommodate defense counsel's pre-existing professional  
12 obligations in other legal matters, and because Defendants need additional time to properly  
13 prepare their reply to adequately address the numerous and complex legal issues raised in  
14 Plaintiffs' Opposition.

15           Upon agreement by and between all the parties, through their respective counsel, the  
16 undersigned counsel requests that this Court grant Defendants a 7-day extension of time, up

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1 to and including, March 20, 2020, to file their reply brief in support of their Motion to Dismiss  
2 Plaintiffs' Amended Complaint.

3 DATED: March 11, 2020

4 AARON D. FORD  
5 Attorney General

THE GEDDES LAW FIRM, P.C.

6 By: /s/ Brandon R. Price  
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*Attorneys for Plaintiffs, Ron Schreckengost*  
*and Elizabeth Walsh*

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**ORDER**

IT IS SO ORDERED.



UNITED STATES DISTRICT COURT JUDGE

Dated: March 13, 2020